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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CORNERSTONE STAFFING
SOLUTIONS, INC., a California
corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES, an
individual; DAVID R. BATTON, an
individual, ANDRE DOUZDJIAN, an
individual; MICHAEL SANTOS, an
individual; MARCOS BARRERA, an
individual; BATTON TECHNICAL
ENGINEERING CONSULTANTS, INC.,
a Michigan corporation; BATTON, INC.,
a Michigan corporation a/k/a BATTON
DIVERSIFIED STAFFING
SOLUTIONS; HANBON – CARO I,
LLC, a Michigan limited liability
company a/k/a CARO I, LLC; HANBON
– MI I, LLC, a Michigan limited liability
company d/b/a TECHNICAL
ENGINEERING CONSULTANTS;
HANBON – MI II, INC., a Michigan
corporation d/b/a BATTON
TECHNICAL ENGINEERING
CONSULTANTS; HANBON –
MARLETTE, LLC, a Michigan limited
liability company a/k/a HANBON –
MARLETTE I, LLC; HANBON – PA I,
LLC, a Pennsylvania limited liability
company; HANBON – CT I, LLC, a
Connecticut limited liability company;
TEC GROUP, INC., a Michigan
corporation d/b/a TEC GROUP also d/b/a

) CASE NO. 3:12-CV-01527-RS

) [Assigned to the Hon. Richard Seeborg, judge
presiding in Courtroom 3]

**[PROPOSED] ORDER GRANTING
STIPULATION TO CONTINUE TRIAL
AND MODIFY THE JULY 20, 2013 CASE
MANAGEMENT SCHEDULING ORDER**

1 TEC-CHRYSLER; DEPLOY HR) Filing Date: March 27, 2012
 2 STAFFING, INC.; DEPLOYHR, INC., a) Trial Date: October 28, 2013
 3 California corporation a/d/b TEC also)
 4 d/b/a BATTON; and DOES 1-100.)
 5 Defendants.)
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 7 AND RELATED CROSS-ACTIONS)
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10 Pursuant to the Stipulation by and between the Parties to the above-entitled action to
 11 continue trial and modify the July 20, 2013 Case Management Scheduling Order and for Good
 12 Cause, the Court orders as follows:
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1. The Parties shall produce written expert reports pursuant to *Federal Rule of Civil*
Procedure §26(a)(2)(B) by September 27, 2013.
2. All non-expert discovery shall be completed by November 22, 2013.
3. All expert discovery shall be completed by December 20, 2013. 23,
4. Counsel for the Parties shall file a Joint Pre-trial Statement by January 9, 2014. 30,
5. The final Pre-trial Conference shall be held on January 16, 2014. February 10,
6. Trial shall commence on January 27, 2014 or a date as convenient with the Court's
 17 schedule.

18 DATED: 6/21/13
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 21 UNITED STATES DISTRICT JUDGE
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